

**REMARKS**

Claims 1-28 are pending. Applicants amend claims 1, 18 and 27, as shown above. As discussed in more detail below, support for the amendments can be found in the specification, e.g., on page 2. Thus, no new matter is added. Applicants note with appreciation the Examiner's assertion that certain features highlighted in Applicants response to the previous Office Action (e.g., the external management system is utilized to manage the network device) were not expressly reflected in the claims. The present claims amendments are made to more clearly recite these features, as discussed in more detail below.

**Rejections Under 35 U.S.C. 102**

The Office Action rejects claims 1-14 as being anticipated by U.S. Patent No. 6,345,288 of Reed.

Claim 1, as amended, recites a method of operating a telecommunications system that comprises: sending a first metadata file from a network device to an external management system, generating a first management data file within the network device, sending the first management data file from the network device to the external management system, and processing the first management data file in accordance with the first metadata file *in the external management system for managing the network device*.

Support for the amendment to claim 1 can be found, for example, on page 2, and throughout the remainder of the specification. Thus, no new matter is added.

Reed does not teach sending metadata from a network device to an external management system such that the external management system can utilize the metadata to process a management data file, received from the network device, so as to manage the device. Rather, Reed discloses a system that can automatically update a database in a consumer computer with information (which can include data, metadata and instructions) from a provider computer. The consumer computer, however, is not utilized to manage the provider computer, and hence cannot be considered an external management system. Moreover, there is no indication in Reed that

any metadata transferred from the provider computer to the consumer computer is related to the management of the provider computer.

Accordingly, Reed fails to teach salient features of the claimed method, and its associated advantages. For example, the method of claim 1 allows an external management system to dynamically learn how to manage a network device by utilizing the information provided by a metadata file to process a management file corresponding to that network device. This can be particularly useful when new hardware is added to a network device. In such a case, a new management data file can be sent to the external management system, together with metadata for interpreting the data file, to allow the external management system to manage the device with the new hardware without any need for rebooting.

Accordingly, claim 1 and claims 2-14, which depend either directly or indirectly on claim 1, distinguish patentably over Reed.

#### **Rejections Under 35 U.S.C. 103**

The Office Action rejects claims 15-17 as being obvious over Reed.

These claims depend on claim 1, and hence incorporate its features. As discussed above, Reed fails to teach salient features of amended claim 1 and consequently those of claims 15-17. Accordingly, the above reasoning applies to establish that claims 15-17 are patentable over Reed.

#### **Rejections of claims 18-28**

These claims are rejected for similar reasons as those set forth above for rejecting claims 1-17.

Independent claim 18, as amended, recites a method of operating a telecommunications system that comprises: sending a first plurality of metadata files from a first network device to an external management system, generating a first plurality of management data files within the

first network device, sending the first management data files from the first network device to the external management system, and processing each of the first management data files in accordance with a corresponding one of the first metadata files in *said external management system for managing the network device*.

The arguments presented above in connection with claim 1 apply with equal force to establish that independent claim 18 is also patentable over the cited references. In particular, similar to claim 1, claim 18 recites that the external management system utilizes the metadata files to process associated management files for managing the network device – features not taught by the cited references.

Independent claim 27, as amended, recites a telecommunications system that comprises a network device including an internal management subsystem that is capable of generating a management file, and an external management system. The internal management subsystem is capable of pushing the management data file and a corresponding metadata file to the external management system, and the external management system is capable of processing data in the management data file in accordance with the metadata file *for managing the network device*.

The arguments presented above apply with equal force to establish that claim 27, and claim 28 that depends on claim 27, are also patentable over the cited art. In particular, the cited art fails to teach an internal management subsystem that is capable of pushing management data and a corresponding metadata file to an external management system, which in turn is capable of processing data in the management data file in accordance with the metadata file for managing the network device.

### CONCLUSION

In view of the above amendments and remarks, Applicants respectfully request reconsideration and allowance of the application. Applicants invite the Examiner to call the undersigned at (617) 439-2514 if there are any remaining issues.

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Respectfully submitted,

By 

Reza Mollaaghababa

Registration No.: 43,810

NUTTER MCCLENNEN & FISH LLP

World Trade Center West

155 Seaport Boulevard

Boston, Massachusetts 02210-2604

(617) 439-2000

(617) 310-9000 (Fax)

Attorney for Applicant

1436275.1